

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	
CHRISTOPHER A. STONE)	
BRITTANIE N. STONE,)	Bankruptcy No. 17-23825-JAD
<u>Debtor(s)</u>)	
)	Chapter 13
SANTANDER CONSUMER USA INC.,)	
<u>Movant</u>)	Doc. No. 85
v.)	
)	Related To Doc. No. 75
CHRISTOPHER A. STONE)	
BRITTANIE N. STONE,)	
<u>Respondent(s)</u>)	
)	
RONDA J. WINNECOUR,)	
<u>Trustee</u>)	

STIPULATION

NOW COMES Santander Consumer USA Inc. (“Santander”), by and through its counsel, Morton & Craig LLC, and Christopher and Brittanie Stone (“Debtors”) by and through their counsel Daniel R. White, Esquire, and stipulate and agree as follows:

RECITALS

WHEREAS, the Debtors filed a voluntary petition for relief under Chapter 13 of Title 11, United States Code on September 25, 2017;

WHEREAS, the Debtors and Santander are parties to a Motor Vehicle Installment Sales Contract dated December 22, 2016 (the “Contract”) whereby the Debtors financed the purchase of a 2016 Dodge Grand Caravan bearing vehicle identification number 2C4RDGCG4GR272953 (the “Vehicle”);

WHEREAS Santander filed a Motion For Stay Relief due to the Debtors’ account with the Chapter 13 Trustee being delinquent in the amount of \$6,360.00 through August 2020;

WHEREAS, the Debtors and Santander have resolved said Motion and seek to enter into this Stipulation to resolve said issues.

NOW THEREFORE, the Debtors and Santander hereby stipulate and agree as follows:

1. The Debtors are to make each payment to the Chapter 13 Trustee within the month that it falls due.
2. That if the Debtors should fail to make any payment to the Chapter 13 Trustee within thirty (30) days after the date that it falls due, Santander may send, via facsimile and regular mail, written notice of default of this Order. If the default is not cured within twenty (20) days of the date of the notice, Santander shall be entitled to stay relief upon the filing of an Affidavit Of Default.

Consented To:

/s/ William E. Craig
William E. Craig, Esquire
PA ID# 92329
Morton & Craig LLC
110 Marter Avenue, Suite 301
Moorestown, NJ 08057
(856) 866-0100
bcraig@mortoncraig.com
Attorney For Movant Santander Consumer USA Inc.

/s/ Daniel R. White
Daniel R. White, Esquire
PA ID# 78718
Zebley Mehalov & White, P.C.
18 Mill Street Square
P.O. Box 2123
Uniontown, PA 15401
(724) 439-9200
dwhite@zeblaw.com
Attorney for Debtors


/s/ Owen Katz
Owen Katz
For Trustee Ronda J. Winnecour
Chapter 13 Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

AND NOW, this 15th day of September, 2020, upon consideration of the Stipulation entered into by counsel for Santander Consumer USA Inc. and with the Debtors, it is hereby ORDERED, ADJUDGED and DECREED that the terms of the foregoing Stipulation are hereby approved in their entirety.

It is FURTHER ORDERED that the hearing scheduled for September 16, 2020, at 2:30 PM, IS CANCELLED.

BY THE COURT:

Dated: September 15, 2020


The Honorable Jeffery A. Deller^{mas}
United States Bankruptcy Judge

Certificate of Notice Page 4 of 4
United States Bankruptcy Court
Western District of Pennsylvania

In re:
Christopher A. Stone
Brittanie N. Stone
Debtors

Case No. 17-23825-JAD
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2

User: nsha
Form ID: pdf900

Page 1 of 1
Total Noticed: 1

Date Rcvd: Sep 15, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 17, 2020.

db/jdb Christopher A. Stone, Brittanie N. Stone, Route 21 Mobile Home Park--Lot 19,
Carmichaels, PA 15320

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 17, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 15, 2020 at the address(es) listed below:

Daniel R. White on behalf of Debtor Christopher A. Stone zmwchapter13@gmail.com,
gianna@zeblaw.com;sheila@zeblaw.com;r63228@notify.bestcase.com
Daniel R. White on behalf of Joint Debtor Brittanie N. Stone zmwchapter13@gmail.com,
gianna@zeblaw.com;sheila@zeblaw.com;r63228@notify.bestcase.com
Garry Alan Masterson on behalf of Creditor Ford Motor Credit Company LLC pitecf@weltman.com
James Warmbrodt on behalf of Creditor NBS Harley-Davidson Credit Corp bkggroup@kmlawgroup.com
James Warmbrodt on behalf of Creditor Harley-Davidson Credit Corp bkggroup@kmlawgroup.com
James P. Valecko on behalf of Creditor Ford Motor Credit Company LLC jvalecko@weltman.com,
PitEcf@weltman.com
Office of the United States Trustee ustpreion03.pi.ecf@usdoj.gov
Ronda J. Winnecour cmecf@chapter13trusteedpa.com
William E. Craig on behalf of Creditor Santander Consumer USA Inc. ecfmail@mortoncraig.com,
mhazlett@mortoncraig.com;mortoncraigecf@gmail.com

TOTAL: 9